

Exhibit D – Deposition of Michelle Wynn

In The Matter Of:
ELIZABETH BECKLEY vs.
CITY OF ATLANTA, GEORGIA

MICHELLE WYNN
February 1, 2017
30(b)(6) DEPOSITION



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1 Topics 1, 2 and 4 of the 30(b)(6). And when we
2 started, you had stated that you also were able to
3 speak on Topic No. 3, which is the City's position
4 regarding why sidewalk ramps have not to date been
5 installed at the intersection of Martin Luther King
6 Boulevard and Centennial Olympic Park Drive.

7 Do you have any knowledge as to that
8 topic?

9 A. I know that that particular
10 intersection is a bridge, and that that bridge has
11 not been replaced; though it is on our list for
12 bridge replacement.

13 Q. Okay. So the bridge hasn't been
14 replaced, but what about repaving? Has the road
15 along that bridge been repaved since 1992?

16 A. We typically do not mill and repave
17 bridges. That's just -- it's not the best way to do
18 that, because you can damage the actual substructure
19 of the bridge.

20 So no, I've not seen any record that we
21 have resurfaced that street since -- that bridge.

22 Q. How would you -- I guess maintain the
23 surface of a bridge like that?

24 A. Typically -- you really don't resurface
25 it. You might do something called micro-surfacing,

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1 where you just put a really thin layer of asphalt on
2 it.

3 Q. Micro-surfacing?

4 A. Yes.

5 Q. And would you expect that -- so you
6 said it hasn't been milled and repaved?

7 A. That's the way we typically resurface
8 streets. You want to take up the bad asphalt and put
9 down new.

10 Q. So for a bridge, you wouldn't file off,
11 or dig up --

12 A. You really don't want to do that. You
13 wouldn't want to do that. So you really would hope
14 that that surface can maintain itself throughout the
15 life of the bridge, and then it would get redone when
16 the bridge is redone.

17 Q. But there is something called
18 micro-surfacing that can be done on a bridge?

19 A. But that's such a smaller layer of
20 asphalt topping. And we typically have only just
21 started doing that at the City, and we only do it on
22 really small local streets.

23 So we would not have done that -- we
24 definitely would not have done that before -- I think
25 we've only been doing it for about maybe three years.

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1 So we wouldn't have done it any time before, for
2 this, you know.

3 Q. Do you know for a fact? I mean, can
4 you state for a fact whether that -- the surface of
5 that bridge has been repaved or not?

6 A. I can say that I've seen no records
7 that it has been resurfaced.

8 Q. What about the roads leading to the
9 bridge?

10 A. Well, actually, that whole -- that
11 bridge it pretty long. The bridge on COP goes all
12 the way back to CNN Center, pretty much back to
13 Marietta, almost. And then the bridge on MLK
14 actually comes all the way back to where the old
15 Rich's was.

16 Q. Okay. So is that -- as far as you
17 know, is that the City's position as to why that
18 sidewalk has not been brought into compliance?

19 A. Right. Because those ADA ramps will be
20 addressed when the bridge is replaced.

21 Q. And is there a plan to bring that -- or
22 to replace that bridge?

23 A. We just actually received an RFP. The
24 proposals just came in last week on that project, so
25 we're reviewing that RFP now for design.